REMARKS

The Examiner allowed claims 5, 6, 13, 14, 19, 20, and 27.

The Examiner rejected pending claims 1-4, 7-12, 15-18, and 21-26 as obvious (35 U.S.C. §103) over Graefe (U.S. Patent No. 6,298,342). Applicants traverse the prior art rejections for the following reasons.

Applicants added claims 28-31, which depend from independent claims 1, 9, 17, and 22 and further require that the transform operation modifies the content of the at least one cell. These claims are patentable over the cited art because they depend from claims 1, 9, 17, and 22, which are patentable over the cited art for the reasons discussed below, and because the additional requirements of these claims in combination with the base claims provide further grounds of patentability over the cited art.

Independent claims 1, 9, and 17 require transforming data in an input table in a database in a server in communication with a client by: receiving from the client a transform command indicating an input data table name in the database and at least one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell; accessing a copy of the input table from the database; and transforming, within the server, data in the accessed input table according to each rule specified in the transform command.

The Examiner cited col. 5, lines 46-67 as teaching the claim requirements of receiving from the client a transform command indicating an input data table name in the database. (Fifth Office Action, pg. 3). Applicants traverse.

The cited col. 5 discusses a query transmitted from a client to query columns in a table, and select records from an input table to appear in an output table whose sales are less than the average of all values of sales. Although the cited col. 5 discusses selecting columns from an input table to pivot into an output table, nowhere does the cited col. 5 anywhere disclose receiving a transform command and at least one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell.

The Examiner recognized that Graefe does not disclose one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell. The Examiner then found that it is well known in the art to apply a rule in a

transform command and that the teachings of Graefe may be modified to include a transform command indicating an input table name and at least one rule indicating a transform operation to perform with at least cell. (Fifth Office Action, pgs. 3-4) Applicants traverse this proposed modification of Graefe because the Examiner has not cited any art that teaches, suggests or discloses the claim requirement of receiving from the client a transform command indicating an input data table name in the database and at least one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell and that the server then accesses the input table according to the rule.

The Manual of Patent Examination and Procedure (MPEP) states that "[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination." (MPEP, Sec. 2143.01, pg. 2100-126, 8th Ed., Feb. 2003).

The Examiner cited col. 3, lines 7-9 to justify the modification to the query of Graefe to include at least one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell. (Fifth Office Action, pg. 4). The cited col. 3 mentions a pivot operation to transform the rows and columns of a table to provide different perspectives of the data. Although the cited Graefe discusses pivot operations to provide different perspectives of data, nowhere does the cited Graefe anywhere teach, suggest or indicate that a transform command from a client indicate at least one rule indicating at least one cell in the input table to transform and a transform operation to perform with respect to the at least one cell and that the server then accesses the input table according to the rule.

Here the Examiner is proposing a modification that is nowhere taught, suggested or mentioned in the cited Graefe, but is only found in the claim requirements themselves. Thus, even if the Examiner could find art suggesting a transform command including a rule, nowhere has the Examiner cited any art suggesting a modification of Graefe to have a client transform command indicating an input data table name and at least one rule to transform a cell. Instead, the cited Graefe discusses a pivot operation to take data from an input table and pivot into a column or row in an output table. Nowhere does the cited Graefe anywhere teach or suggest that a transform command from a client indicate at least one cell and a transform operation to perform to the at least one cell.

Accordingly, for all the above reasons, Applicants submit that claims 1 9, and 17 are patentable over the cited Pirahesh and Romer, alone or in combination.

Claims 2-4, 7, and 8; 10-16, and 18-21 and 26 are patentable over the cited art because they depend from claims 1, 9, and 17, respectively, which are patentable over the cited art for the reasons discussed above. Moreover, claims 2, 4, 7, 8, 10, 12, 15, 16, 18, 21, 22, and 26 provide additional ground of patentability over the cited art.

Claims 2, 10, and 26 depend from claims 1, 9, and 17 , respectively, and further require that the client is a client computer that communicates with the server over a network, wherein the transform command is transmitted from the client computer to the server over the network. The Examiner cited col. 4, lines 53-55 of Graefe as teaching the additional requirements of these claims. (Fifth Office Action, pg. 4) Applicants traverse.

The cited col. 4 of Graefe mentions an external storage medium which may store client and server software for distribution and downloading to clients. Nowhere does this cited col. 4 anywhere teach or suggest the claim requirement that a client computer transmits a transform command as claimed to a server over the network to transform data within the server as claimed.

Accordingly, claims 2, 10, and 26 provide additional grounds of patentability over the cited art.

Claims 4, 12, and 18 depend from claims 1, 9, and 17 and further require that the transform command rules specify multiple transform operations to perform on at least one cell in the accessed input table. An application of a subsequent transform operation following a previous transform operation on one cell transforms previously transformed data in the cell. The Examiner cited col. 3, lines 7-20 of Graefe as teaching the additional requirements of these claims. (Fifth Office Action, pg. 5) Applicants traverse.

The cited col. 3 discusses a pivot operation to transform the rows and columns of a table to provide a different perspective. This type of pivot operation can be integrated into conventional database query processors, search engines and servers. Nowhere does the cited col. 3 anywhere teach or suggest the claim requirement of rules specifying multiple transform operations on cells in an accessed input table to transform the data, such that a subsequent transform operation following a previous transform operation on one cell transforms previously transformed data in the cell. Nowhere does the cited pivot operation of Graefe anywhere teach,

suggest or disclose multiple transform operations on a cell such that a subsequent transform follows a previous transform on one cell previously transformed.

Accordingly, claims 4, 12, and 19 provide additional grounds of patentability over the cited art.

Claims 7, 15, and 26 depend from claims 1, 9, and 17 and further require that the client cannot affect the execution of the transform command during the execution of the transform command, whereby the transform command executes in the server independently of the client. The Examiner cited col. 4, lines 53-55 of Graefe as teaching the additional requirements of these claims. (Fifth Office Action, pg. 5) Applicants traverse.

The cited col. 4 of Graefe mentions an external storage medium which may store client and server software for distribution and downloading to clients. Nowhere in the cited col. 4 is there any teaching, suggestion or mention of the claim requirement that a client cannot affect the execution of the transform command so that the command executes independently of the client that provided the transform command to the server. Applicants request the Examiner to cite specific sections of the references teaching this requirement if the rejection is maintained.

Accordingly, claims 7, 15, and 26 provide additional grounds of patentability over the cited art.

Claims 8, 16, and 21 depend from claims 1, 9, and 17 and further require that the transform command comprises multiple rules, wherein each rule specifies at least one column in the input table and at least one transform operation to perform on each specified column in the input table. At least two rules specify different columns in the input table and different transform operations to apply to each specified column. The Examiner cited the relational algebra operations discussed in col. 10, lines 57-66 and col. 3, lines 7-9 of Graefe as teaching the additional requirements of claims 8, 16, and 21. (Fifth Office Action, pgs. 5-6) Applicants traverse.

The cited col. 3 mentions a pivot operation to transform rows and columns to provide different perspective of a table. The cited col. 10 mentions rewrite rules in simplifying the execution of a query and that if a table is partitioned an operation to reassemble complete rows and a subsequent unpivot may cancel each other. The cited col. 10 further mentions techniques for optimizing queries.

Nowhere does the cited Graefe anywhere teach or suggest a transform command having multiple rules, where each rule specifies at least one column and at least one transform operation to perform on each specified column, where at least two rules specify different columns in the input table. Instead, the cited col. 3 discusses a pivot operation and the cited col. 10 rewrite rules.

For these reasons, claims 8, 16, and 21 provide additional grounds of patentability over the cited art.

Claims 22-25 include many of the distinguishing requirements found in claims 1, 4, 6, and 8 in data structure format, and are patentable over the cited art for the reasons discussed with respect to claims 1, 4, and 6.

Conclusion

For all the above reasons, Applicant submit that all the pending claims 1-31 are patentable over the art of record. Applicants submit herewith the fees for the added claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: March 22, 2004

By: _____

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